

Applicants have amended claim 20 to overcome the rejection under 35 USC Section 112, regarding insufficient antecedent basis. Applicants appreciate the Examiner's drawing this insufficiency to their attention.

Regarding the rejection of claims 14-20 under 35 USC Section 102(b) as being anticipated by Andros (US Patent No. 5,844,030), Applicants respectfully submit that these claims, as presently amended, are allowable over the prior art of record. The '030 patent describes a method of using charged polyvinyl alcohol based foam for cleaning applications. The described technique modifies the cleaning surface's (e.g., the PVA's) surface charge to selectively create either electrostatic attraction for attracting/cleaning particles from a surface to be cleaned, or electrostatic repulsion to repel particles from the cleaning surface (e.g., PVA) and to thereby regenerate the cleaning surface. The '030 patent does not teach or suggest a "complexing agent adapted to chemically bond to metal particles," as required by claims 14, 19 and 20, and by claims 15-18 which depend from claim 14.

The pending claims, as currently amended, require that the complexing agent be adapted to chemically bond to the metal particles, unlike the electrostatic attraction of the '030 patent. Accordingly, Applicants respectfully submit that claims 14-20, as presently amended, are in condition for allowance, and request that the application be passed to issuance. Applicants encourage the Examiner to phone Applicants' undersigned attorney should any issues remain.

A Petition for a two-month time extension with the required fee accompanies this Amendment. If any additional fees are required, however, please charge Deposit Account No. 04-1696.

Respectfully Submitted,

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VERSION MARKED TO SHOW CHANGES

In the Claims:

Claims 14, 19 and 20 have been amended as follows:

14. (Amended) A brush apparatus comprising:

a scrubber brush having:

a surface adapted to contact a surface of a substrate to be scrubbed; and

a complexing agent coupled to the scrubber brush surface, the complexing agent adapted to chemically bond to metal particles.

19. (Amended) An apparatus comprising:

a scrubber brush comprised of a homogeneous material comprising a complexing agent adapted to chemically bond to metal particles, and having a surface adapted to contact a surface of a substrate to be scrubbed.

20. (Amended) A scrubber comprising:

a substrate support adapted to support a substrate;

a brush coupled so as to contact a substrate supported by the substrate support, the brush having:

a surface adapted to contact a surface of a substrate to be scrubbed; and

a complexing agent coupled to the [scrubber] brush surface, the complexing agent adapted to chemically bond to metal particles; and

a mechanism adapted to generate relative movement between the substrate and the brush[apparatus].